

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

John DOE,
d/b/a “www.dcgcompanytriangle.com” and
“dcgtriangle.com”

Defendant.

Case No. 4:25-cv-00529-BCW

**COMPLAINT FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY AND PERMANENT INJUNCTION**

For its Complaint against Defendant John Doe (“Defendant”), d/b/a “www.dcgcompanytriangle.com,” d/b/a “dcgtriangle.com,” the United States of America (“United States”) alleges as follows:

INTRODUCTION

1. Defendant is engaging in a cryptocurrency wire fraud investment scheme that has and continues to defraud individuals throughout the United States, including at least one individual located in the Western District of Missouri.

2. On May 10, 2024, NameSilo LLC registered on behalf of Doe the websites “www.dcgcompanytriangle.com” and “dcgtriangle.com.” Both websites direct visitors to an online application called “Triangular” that mimics the appearance of legitimate crypto exchanges or investment platforms, and which purports to allow consumers to invest in cryptocurrency.

3. The Triangular application is fake; its real purpose is to trick users into sending funds to Defendant.

4. The United States seeks to prevent continuing and substantial injury to victims of this fraudulent scheme by bringing this civil action under 18 U.S.C. § 1345 to enjoin Defendant's ongoing wire fraud in violation of 18 U.S.C. § 1343.

CAUSES OF ACTION

5. The United States brings this civil action for injunctive relief pursuant to the Anti-Fraud Injunction Act, 18 U.S.C. § 1345, based upon predicate violations of wire fraud.

6. The United States has probable cause to believe that the commission of wire fraud, as defined by 18 U.S.C. § 1343, occurred and will occur in the future absent relief pursuant to 18 U.S.C. § 1345.

JURISDICTION AND VENUE

7. This Court has jurisdiction of this action pursuant to 18 U.S.C. § 1345 (Anti-Fraud Injunction Act), 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1345 (United States as plaintiff).

8. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this district.

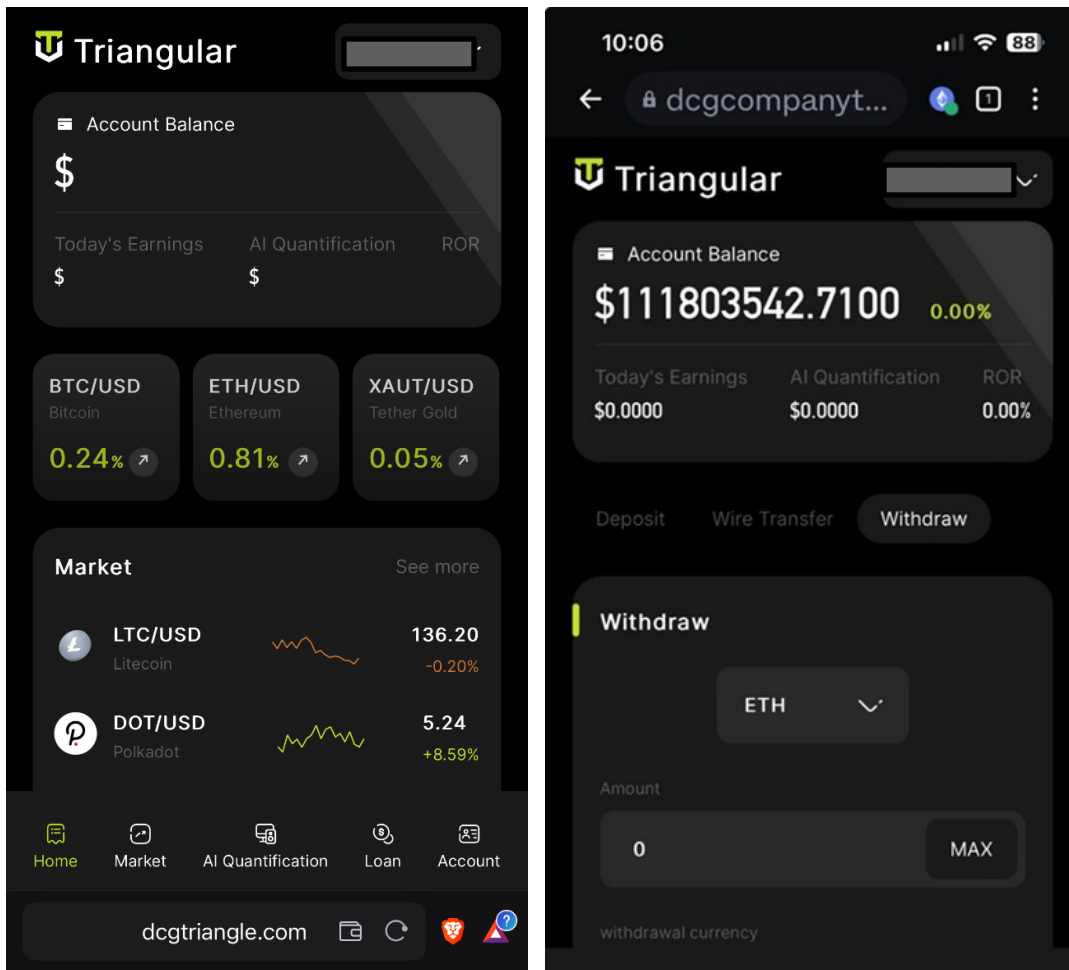
PARTIES

9. Plaintiff is the United States of America.

10. Defendant John Doe, acting alone or in concert with others, is the unknown registrant of “www.dcgcompanytriangle.com” and “dcgtriangle.com” and who has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint.

THE FRAUDULENT SCHEME

11. On July 7, 2025, FBI Special Agent Savannah Latta, from a computer located in Kansas City, Missouri, visited “dcgtriangle.com” and “www.dcgcompanytriangle.com” and through both websites observed a cryptocurrency trading platform interface for “Triangular.” As depicted in the screenshot below, the platform displays the purported account balance of any cryptocurrency wallets that the user has linked to their Triangular account. The website interface also provides market updates for various cryptocurrency tokens, including Bitcoin, Ethereum, and Litecoin.



12. Numerous individuals have transferred cryptocurrency to the Triangular websites believing it was a legitimate investment platform, including one individual located in the Western District of Missouri who deposited approximately \$16 million. The platform appeared to show rapid gains in victims' account balance shortly after they deposited cryptocurrency. However, when the victims attempted to withdraw some or all their investment funds, Defendant demanded that they first pay thousands of dollars in fees or loan repayment costs.

13. A blockchain analysis of the victims' cryptocurrency deposits show that the funds were never invested but rather quickly moved from the deposit wallet

address, through various intermediary wallets and eventually cashed out by the Defendant into alternative cryptocurrencies or fiat currency.

14. NameSilo LLC plays a critical role in the scheme by serving as the domain registrar of the website, which allows potential victims to access the website.

15. As of this date, the websites are still accessible to the public.

16. Victims suffered financial losses from the wire fraud scheme engaged in and facilitated by Defendant.

17. Absent injunctive relief by this Court, Defendant's conduct will continue to cause injury to victims.

COUNT I
18 U.S.C. § 1345 – INJUNCTIONS AGAINST FRAUD

18. The United States re-alleges and incorporates here the allegations in paragraphs 11 through 17 of this Verified Complaint.

19. By reason of the conduct described herein, Defendant has violated, is violating, and is about to violate 18 U.S.C. § 1343 by engaging in and facilitating a scheme and artifice to defraud and obtain money or property by means of false or fraudulent representations with the intent to defraud, and, in so doing, use interstate or foreign wire communications.

20. Upon a showing that Defendant is committing or about to commit a violation of 18 U.S.C. § 1343, the United States is entitled, under 18 U.S.C. § 1345, to seek a temporary restraining order, a preliminary injunction, and a permanent injunction restraining all future fraudulent conduct. The Court may also grant such

other relief it deems just and proper to prevent a continuing and substantial injury to victims of the fraud scheme.

21. As a result of the foregoing, the Court should enjoin Defendant's conduct under 18 U.S.C. § 1345.

DEMAND FOR RELIEF

THEREFORE, the United States requests judgment in its favor and against the Defendant, including the following relief:

(a) That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a hearing and determination of the United States' application for a preliminary injunction, that Defendant, its agents, officers, and employees, and all other persons or entities in active concert or participation with them, are temporarily restrained from committing wire fraud, as defined by 18 U.S.C. § 1343, and from maintaining and doing business using the domains "dcgtriangle.com" and "www.dcgcompanytriangle.com";

(b) That the Court issue an order directing that the Registry or Registrar identified below shall take the following actions with respect to the domains "dcgtriangle.com" and "www.dcgcompanytriangle.com";

Top Level Domain	Domain Registry	Contact Information
.com	Verisign, Inc.	12061 Bluemont Way Reston, VA 20190

Domains	Domain Registrar	Contact Information
dcgtriangle.com	NameSilo LLC	1300 E. Missouri Avenue Suite A-110 Phoenix, AZ 85014
www.dcgcompanytriangle.com	NameSilo LLC	1300 E. Missouri Avenue Suite A-110 Phoenix, AZ 85014

1. disable the domain names, through a registry or registrar hold, making them inactive;
2. impose a registry or registrar lock on the domain names to prevent any change, transfer, or deletion of such domain names without the previous authorization of this Court; and
3. provide reasonable assistance in implementing the terms of the order and take no action to frustrate the implementation of the order

(c) That the Court issue a preliminary injunction, pursuant to 18 U.S.C. § 1345, on the same basis and to the same effect;

(d) That the Court issue a permanent injunction, pursuant to 18 U.S.C. § 1345, on the same basis and to the same effect;

(e) All such further relief as may be just and proper.

Respectfully submitted,

Jeffrey P. Ray
Acting United States Attorney

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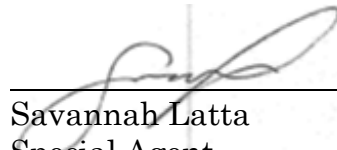
VERIFICATION

I, Special Agent Savannah Latta, hereby verify and declare under penalty of perjury that I am a Special Agent of the Federal Bureau of Investigation, that I have read the foregoing Verified Complaint *in Rem* and know the contents thereof, and that the factual matters contained in paragraphs 11 through 17 of the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief, and as to those matters, I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent of the Federal Bureau of Investigation.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: July 11, 2025



Savannah Latta
Special Agent
Federal Bureau of Investigation